

Reply Comments from LARCAN USA INC

Many comments include statements about the desirability of translators that regenerate the bit stream as opposed to conventional translators that pass the signal through unchanged. There is general agreement that regenerating the bit stream is worthwhile if economically feasible. Not only does it restore the quality of the outgoing signal (improved signal to noise ratio) but it eliminates the pass-through of noise or interfering signals from the two channels adjacent to the input. If there are adjacent channel signals in the area the reduction in the energy in the adjacent channel shoulders of the output spectrum can be very dramatic and make the difference between meeting the emission mask or not. Accordingly Larcan-USA urges that the FCC include a preference for translators that regenerate the bit stream in the adopted rules. We do not, however, suggest making the use of regenerative circuitry absolutely mandatory as this would increase the cost of translators to be used in very small isolated communities where there are no adjacent channel concerns.

The comments of Greg Best state at page 2, §21:

“It is estimated that the present cost of modifying an existing translator to a regenerative digital translator is around \$10,000.

We are pleased to report that we expect to be able to offer a replacement for the signal processing section of a translator with a 41 to 47 Mhz IF for a cost of under \$3500.00. This includes most translators manufactured in the last 10 years and many that are older. Further the incremental cost of a new translator with the regenerative circuitry is expected to be only about \$2500.00 more than a straight pass through heterodyne translator.

In the same paragraph the Greg Best comments also state:

“Depending on the number of stations that convert immediately to digital, it may be difficult for manufacturers to assemble and test and distribute enough regenerative modulators in a relatively short period of time given that there are approximately 4700 translators already in the field.”

Contrary to the above comment we expect the appearance of digital translators will be fairly evenly spread out over a considerable period of time and that there will not be a surge in demand for the following reasons:

- 1) Most translator licensees will opt to obtain an authorization for a companion digital translator rather than deprive their area of an analog signal during the transition. The Commission can be expected to process applications and grant construction permits in a steady stream and not release thousands or even hundreds at once. The demand for equipment will follow this even flow.

2) Most “flash-cut” conversions from analog to digital on the same channel will be in very small communities. Again there is no reason to believe there will be a rush of such conversions the moment the rules permit them, but rather the process will be gradual.

We do not believe the availability of the regenerative sub-assemblies for either new production or retrofitting existing translators will inhibit the widespread use of this preferable technique.

Respectfully submitted:

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